

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

Re: Docket No. 1451

**CERTIFICATION OF COUNSEL REGARDING ORDER APPROVING STIPULATION
RESOLVING THE MOTION OF BDPM GROUP, LLC TO COMPEL IMMEDIATE
PAYMENT OF STUB RENT AND POST-PETITION RENT AND OBLIGATIONS
PURSUANT TO 11 U.S.C. §§ 365(d)(3) AND 503(b)(1)(A)**

The undersigned counsel to the BDPM Group, LLC hereby certifies as follows:

1. On December 27, 2024, BDPM Group, LLC (“BDPM”) filed the *Motion of BDPM Group, LLC to Compel Immediate Payment of Stub Rent and Post-Petition Rent and Obligations Pursuant to 11 U.S.C. §§ 365(d)(3) and 503(b)(1)(A)* [Docket No. 1451] (the “Motion”).
2. Counsel for BDPM and counsel for the Debtors engaged in negotiations to consensually resolve the Motion, and have reached an agreement regarding the Motion. The Parties have memorialized their agreement in the *Stipulation Between Big Lots, Inc., and BDPM Group, LLC* (the “Stipulation”).
3. The Parties have prepared a proposed order (the “Proposed Order”), a true and correct copy of the Proposed Order is attached hereto as **Exhibit A**, approving the Stipulation. A true and correct copy of the Stipulation is attached as **Exhibit 1** to the Proposed Order.

¹ The debtors and debtors-in-possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores – PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores – CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163) INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. DublinGranville Road, Columbus, OH 43081.

WHEREFORE, it is hereby respectfully requested that the Court enter the Proposed Order at the earliest convenience of the Court.

Dated: March 13, 2025

MORRIS JAMES LLP

/s/ Christopher M. Donnelly

Carl N. Kunz, III (DE Bar No. 3201)

Christopher M. Donnelly (DE Bar No. 7149)

500 Delaware Avenue, Suite 1500

Wilmington, DE 19801

Telephone: (302) 888-6800

Facsimile: (302) 571-1750

E-mail: ckunz@morrisjames.com

cdonnelly@morrisjames.com

Counsel to BDPM Group, LLC